MAY 0 4 1994

WQP-16J

Mr. David W. Golightly
Environmental Affairs and Safety Manager
Amoco Corporation
Amoco Research Center
Post Office Box 3011
Naperville, Illinois 60566-7011

Re: Request for Federal Pretreatment Determination

Dear Mr. Golightly:

This is in response to your January 21, 1994, letter requesting a categorical pretreatment determination for your facility. Specifically, you requested determinations for several areas of research because the zoning for the Amoco Research Center has recently changed to allow for the sale of some products. Due to this change, the research center can no longer be considered a stand alone facility and, therefore, may be subject to categorical pretreatment standards. Based on the information in your letter and a phone conversation between you and Cathy Scudieri of my staff, the United States Environmental Protection Agency, Region 5, has made the following requested pretreatment determinations for seven areas of your research.

1. The area of specialty grease blending is not subject to the categorical pretreatment standards under 40 CFR 419, Petroleum Refining, because it does not fall into one of the manufacturing process categories which are regulated.

2. The area of secondary scrap polymer generation is not subject to the categorical pretreatment standards under 40 CFR 414, Organic Chemicals, Plastics, and Synthetic Fibers. In this category only contact water is regulated and Amoco's secondary scrap polymer process uses only non-contact cooling water.

3. The areas of 25-hydroxyvitamin D3 manufacturing and research and development (R&D) are not subject to the categorical pretreatment standards under 40 CFR 439, Pharmaceutical Manufacturing. The manufacturing process is not subject to these standards because it generates no process water. The R&D process is not subject to the categorical pretreatment standards at this time because no pretreatment standards have been promulgated for the research subcategory yet.

4. The area of Amoco Oil pilot plant operations is not subject to categorical pretreatment standards under 40 CFR 419, Petroleum Refining, because this area is strictly R&D and no products are produced for sale.

5. The area of Ultradel polymers is subject to categorical pretreatment standards under 40 CFR 414, Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF), because Ultradel is manufactured for sale and produces process wastewater. Ultradel is a polyamide and is regulated under Subpart D, Thermoplastic Resins. Also, subject to categorical pretreatment standards, according to 40 CFR 414.11(b), is any research and development, pilot plant, technical service and laboratory bench scale operations if such operations are conducted in conjunction with and related to existing OCPSF manufacturing activities at the plant site. The R&D as well as the manufacturing wastewater would thus be subject to 40 CFR 414.

6. The area of semiconductor diode laser crystal development is subject to categorical pretreatment standards under 40 CFR 469, Electrical and Electronic Components, Subpart B, Electronic Crystals, because it manufactures electronic crystals for sale and produces process wastewater.

7. The area of Amoco Chemical Company plastics molding and forming operation is not subject to categorical pretreatment standards. There are no categorical pretreatment standards under 40 CFR 463, Plastics Molding and Forming, as the language merely requires compliance with 40 CFR 403 General Pretreatment Regulations.

If, subsequent to this determination, circumstances change for any of these research areas, the determination should be reconsidered, and categorical pretreatment regulations may apply.

There are Federal monitoring and reporting requirements for the two areas subject to categorical pretreatment regulations. According to 40 CFR 403.12(b)(d)(e) you must submit a Baseline Monitoring Report (BMR), a Final Compliance Report, and Continued Compliance Reports. Enclosed you will find these reporting forms along with their instructions. The BMR must be submitted 180 days from receipt of this letter to the address given in the instructions. The Final Compliance report must be submitted 30 days after submission of the BMR. The Continued Compliance Reports must be submitted during the months of June and December of each year starting with December 1994. If you have any further questions, please feel free to contact me at (312) 886-6089 or Cathy Scudieri at (312) 353-2098.

Sincerely yours,

Matthew Gluckman
Pretreatment Coordinator

Enclosures

bcc: Acierto, WC-15J
Keclik, WC-15J
Gluckman
Scudieri

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